

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Case No. 1:24-cr-83-TBM-BWR
	§	
TYLER SURLA	§	

**UNOPPOSED MOTION TO CONTINUE TRIAL TO JUNE 2025
AND SET A DATE CERTAIN FOR TRIAL TO COMMENCE**

TO THE HONORABLE TAYLOR B. MCNEEL:

COMES NOW TYLER SURLA, DEFENDANT, and files this Motion to Continue Trial to June 2025 and Set a Date Certain for Trial to Commence, for cause showing the Honorable Court as follows:

1. Posture of the case.

Defendant is charged in a four-count superseding indictment alleging offenses involving child exploitation. Defendant was arraigned on September 4, 2024. The parties have completed discovery and engaged in settlement discussions. Defendant has decided to proceed to trial.

2. Defendant respectfully requests a continuance to June 2025.

Trial is currently set on the Court's April 2025 trial calendar. Due to the complexity of the evidence in this case, undersigned requires additional time

to prepare for trial. Under these circumstances, proceeding to trial on the current trial schedule would prejudice Defendant.

The parties have conferred and agree that all counsel will be available to try this case in June 2025 if the Honorable Court can accommodate this case on the trial docket. The parties jointly estimate that trial will take three (3) days.

Defendant has informed undersigned that he wants to proceed to trial without undue delay. Undersigned proposes that a June 2025 trial date would appropriately blend undersigned's need for additional time to prepare for trial with Defendant's request for a trial without undue delay.

Since this case appears certain to proceed to trial, Defendant respectfully requests that the Honorable Court set a date certain for trial to commence.

3. A continuance would serve the ends of justice.

The Defense consents and agrees that the requested delay shall be deemed "excludable delay" under the Speedy Trial Act, 18 U.S.C. §3161(A)(7)(i) and (iv) because, *inter alia*, proceeding to trial on the current trial schedule would deny counsel reasonable time necessary for effective preparation. The Defense furthermore consents and agrees that the ends of justice served by a continuance in this case would outweigh the best interest of the public and Defendant in a speedy trial.

4. Relief requested.

Defendant respectfully requests that the Honorable Court continue trial to June 2025 and set a date certain for trial to commence.

Defendant furthermore respectfully requests that the Honorable Court reset all pretrial deadlines.

Respectfully submitted,

LAW OFFICES OF SEAN BUCKLEY, PLLC

/s/ Sean Buckley
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CERTIFICATE OF CONFERENCE

I certify that on March 11, 2025 I discussed this Motion with AUSA Lee Smith, who stated that the Government is UNOPPOSED.

/s/ Sean Buckley
Sean Buckley

CERTIFICATE OF SERVICE

I certify that I provided a copy of this Unopposed Motion to Continue Trial and Reset Pretrial Deadlines to AUSA Lee Smith and all parties via the ECF system on this the 12th day of March 2025.

/s/ Sean Buckley
Sean Buckley